

U.S. Department  
of Transportation

**United States  
Coast Guard**



Commander  
Eighth Coast Guard District  
Hale Boggs Federal Building

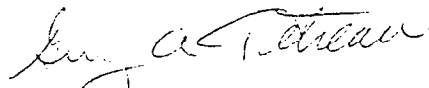
501 Magazine St.  
New Orleans, LA 70130-3396  
Staff Symbol:  
Phone: **moc**  
**(504)589-3624**

16616  
24 September 1997

From: Commander, Eighth Coast Guard District  
To: Distribution

Subj: DANGEROUS CARGO MANIFESTS FOR PACKAGE HAZARDOUS MATERIAL  
ABOARD OFFSHORE SUPPLY VESSELS & UNMANNED DECK BARGES

1. Enclosure (1) provides guidance regarding the use of shipping papers as a dangerous cargo manifest and is forwarded for your information.

  
G. A. TETREAU  
By direction

Encl: (1) CCGD8(moc) ltr 16616 of 22 September 1997

Dist: All Eighth District MSOs, MSU, and MSDs

U.S. Department  
of Transportation

United States  
Coast Guard



Supervisor  
U. S. Coast Guard  
Container Inspection, Training,  
and Assistance Team

Transportation Safety Institute(DTI-120)  
P. O. Box 25082  
Oklahoma City, OK 73125-5050  
(405) 954-8983  
(405) 954-3521(FAX)

16616  
11 Sep 97

From: Supervisor, Coast Guard Container Inspection, Training, and Assistance Team  
To: Commander, Eighth Coast Guard District (moc)

Subj: DANGEROUS CARGO MANIFESTS FOR PACKAGE HAZARDOUS MATERIAL  
ABOARD OFFSHORE SUPPLY VESSELS & UNMANNED DECK BARGES

Ref: (a) Your draft ltr 16616 to Mr R. J. Alario

1. We have reviewed reference(a) and found that it properly addresses the issues with one exception. The issue is 49 Code of Federal Regulation 172.202(a) and (b) which states the sequence that the basic hazardous material description must follow. Shippers that use shipping papers as the Dangerous Cargo Manifest(DCM) sometimes forget the proper sequence in their zeal to minimize paper work and ensure compliance with 49 CFR 176.30. I recommend highlighting this difference between IMDG and 49 CFR in your letter.
2. My staff and I will be departing for three weeks of TAD to various locations. If you have questions regarding this matter, please contact me at the Reserve Training Center Yorktown Marine Safety School at 757-898-2296.

  
S. J. O'MALLEY

U.S. Department  
of Transportation  
United States  
Coast Guard



Commander  
8th Coast Guard District  
Hale Boggs Federal Bldg

501 Magazine Street  
New Orleans, LA 70130-3396  
Staff Symbol: (moc)  
Phone: (504) 589-6271

16616

September 22, 1997

Mr. R. J. Alario  
Offshore Marine Service Association  
990 N. Corporate Drive, Suite 210  
Harahan, LA 70123-3324

Dear Mr. Alario:

This is in response to your letter of March 6, 1997 requesting clarification of the requirement in 49 CFR 176.30 to provide a dangerous cargo manifest (DCM), list or stowage plan on offshore supply vessels (OSVs) carrying packaged hazardous materials. After reviewing the regulations in 49 CFR 172 and 176, I agree that shipping papers may be used to meet the requirements for a dangerous cargo manifest, list or stowage plan on an OSV, provided they:

- o conform to the general requirements for such documents contained in 49 CFR 172.201;
- o contain the specific information required by 49 CFR 172.202(a) arranged in the order required by 49 CFR 172.202(b);
- o contain the information required by 49 CFR 176.30(a), including stowage location;
- o are signed by the vessel's master as required by 49 CFR 176.30(c), and;
- o are carried in the vessels wheelhouse along with any required material safety data sheets.

The operator of any vessel transporting hazardous materials must retain a copy of the shipping papers used for at least one year.

With regard to using shipping papers on barges carrying dangerous cargo, there are already provisions in 46 CFR 151.45-7 for using the shipping document as long as it contains the information listed in 46 CFR 151.45-7.

If we can be of any further assistance, please contact Chief Warrant Officer Gary Busby of my staff at (504) 589-6271.

Sincerely,

A handwritten signature in cursive script, reading "G. A. Tetreau".

G. A. TETREAU  
Commander, U.S. Coast Guard  
Chief, Marine Safety Compliance Branch  
By direction of the Commander  
Eighth Coast Guard District

U.S. Department  
of Transportation

United States  
Coast Guard



Commander (moc)  
Eighth Coast Guard District  
Hale Boggs Federal Bldg.

501 Magazine Street  
Room 1341  
New Orleans, LA 70130-3396  
Phone: (504) 589-6271  
Fax: (504) 589-4999

16616  
18 Jul 1997

From: Commander, Eighth Coast Guard District  
To: Commanding Officer, CG Container Inspection Training and  
Assistance Team

Subj: DANGEROUS CARGO MANIFESTS FOR PACKAGE HAZARDOUS MATERIAL  
ABOARD OFFSHORE SUPPLY VESSELS & UNMANNED DECK BARGES

1. I request your assistance in developing a response to a recent letter from the Offshore Marine Service Association (OMSA) regarding requirements for dangerous cargo manifests (DCMs) aboard offshore supply vessels (OSVs) and unmanned deck barges (see enclosure 1). Enclosure 2 is my draft response to the OMSA letter. Please advise whether enclosure 2 properly addresses the issues presented in the OMSA inquiry.

2. Direct questions on this matter to Lieutenant Commander Bill Daughdrill of my staff at (504) 589-6271.

  
GUY A. TETREAU  
By direction

Encl: (1) OMSA letter dated March 6, 1997  
(2) Draft CCGD8(moc) letter 16616 (undated)



CAPT James C. Calhoun  
Chief, Marine Safety  
U.S. Coast Guard  
Eighth Coast Guard District Headquarters  
501 Camp Street  
New Orleans, LA 70130-3396

March 6, 1997

Re: Hazardous Materials Regulations  
(49 CFR 176.30 - Dangerous Cargo Manifest)

Dear CAPT Calhoun:

The Offshore Marine Service Association (OMSA) has been advised that a strict interpretation of the Hazardous Materials Regulations, as found at 49 CFR 176.30 (b), may place offshore service vessel (OSV) operators in technical violation of the aforementioned regulations. This could potentially occur as a result of the failure of OSV operators to transcribe information from shipping papers to a "Dangerous Cargo Manifest", as stipulated in the regulations. In an effort to reduce the regulatory burden on industry, and to meet the *intent* of the regulations, OMSA proposes that a policy letter be issued by your office regarding acceptable alternatives to compliance, other than strict adherence to the regulations.

OMSA maintains that the cited regulations were developed to ensure that dangerous cargoes could be readily identified as to type, quantity and location aboard a vessel. While a strict interpretation of the regulations is essential for certain vessel types, i.e., a 4,000 TEU Container Ship, the strict application of the regulations poses an unnecessary administrative burden for OSV operators that, in our opinion, does not serve to improve safety considerations with respect to the vessel, its crew or the marine environment.

As you know, OSVs frequently load and/or discharge cargo, including hazardous materials, at several terminals and/or offshore facilities in a single day. The maintenance of a "Dangerous Cargo Manifest" under such operating conditions, in view of the limited quantities of packaged

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OFFSHORE MARINE SERVICE ASSOCIATION

990 N. CORPORATE DRIVE, SUITE 210

HAHAHAN, LA 70126-9324

TELEPHONE (504) 734-7822

FAX (504) 704-7134 ATTN: OMSA

Enclosure (1 )

hazardous materials carried on the deck of an OSV, poses an unnecessary administrative burden on OSV operators that could potentially result in technical violation of the regulations.

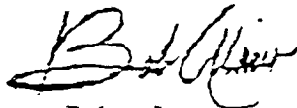
OMSA proposes that a policy letter, or other guidance document, be issued by your office that authorizes OSV operators to use shipping papers in lieu of a "Dangerous Cargo Manifest", provided that the following conditions are met:

- Shipping papers must identify hazardous materials separately from other cargo.
- ✓ • Shipping papers must contain all information and certifications required by 49 CFR 176.30 (a) and (c).
- Shipping papers and associated Material Safety Data Sheets (MSDS) sheets must be kept in a readily accessible location aboard the vessel, such as the wheelhouse.

OMSA also requests that similar consideration be granted to the operators of unmanned deck barges with respect to the provisions of 49 CFR 176.30 (d).

Please do not hesitate to call the undersigned, at (504) 734-7622, if you have any questions, or wish to discuss this matter in further detail. Thank you for your consideration and attention to this important matter.

Very truly yours,  
OFFSHORE MARINE SERVICE ASSOCIATION



Robert J. Alario  
President

U.S. Department  
of Transportation  
United States  
Coast Guard



Commander  
8th Coast Guard District  
Hale Boggs Federal Bldg

501 Magazine Street  
New Orleans, LA 70130-3396  
Staff Symbol: (moc)  
Phone: (504) 589-6271

DRAFT

16616  
Month XX, 1997

Mr. R. J. Alario  
Offshore Marine Service Association  
990 N. Corporate Drive, Suite 210  
Harahan, LA 70123-3324

Dear Mr. Alario:

Thank you for your recent letter concerning the requirement for providing a dangerous cargo manifest, list or stowage plan as required by 49 CFR 176.30, on board Offshore Supply Vessels (OSV) when carrying hazardous materials.

After review of the regulations in 49 CFR 176.30, I agree that the shipping papers could be used to meet the requirements for a dangerous cargo manifest, list or stowage plan on an OSV, as long as they contain the information required by 49 CFR 176.30(a) & (c), provide the location of each hazardous material on the vessel and that the shipping papers and material safety data sheets (MSDS) are maintained in the wheelhouse.

The operator of any vessel transporting hazardous materials must retain a copy of the shipping papers used for at least one year and may be asked to make the documents available to an authorized representative of the Department of Transportation.

With regard to using shipping papers on barges carrying dangerous cargo, there are already provisions in 46 CFR 151.45-7 for using the shipping document as long as it contains the information listed in 46 CFR 151.45-7.

If we can be of any further assistance, you may contact Chief Warrant Officer Gary Eusby of my staff at (504)589-6271.

Sincerely

GUY A. TETREAU  
Commander, U.S. Coast Guard  
Chief, Marine Safety Compliance Branch  
By direction of the Commander  
Eighth Coast Guard District

DRAFT

Enclosure (2)

OMSA, HAZMAT, DD